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September 22, 2020

Honorable Philip M. Halpern  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

***Re: Dana Stephenson v. Exclusive Motor-Sports LLC, Exclusive Motor Sports & Collision Center LLC, Exclusive Motor Cars LLC and Bethpage Federal Credit Union  
Docket No. 7:20-cv-01332-PMH***

Dear Judge Halpern:

Our firm represents the Exclusive Motors defendants in the above-captioned action. I am in receipt of the letter to the Court submitted by counsel for plaintiff requesting a pre-motion conference in connection with her proposed motion for leave to file a second amended complaint. I am also in receipt of the letter from Michele Bholan, Esq., counsel for co-defendant BFCU, in opposition. On behalf of our clients, I join in BCFU's opposition to the proposed motion, for the reasons stated in Ms. Bholan's letter to the Court. We particularly agree that the charges filed in the referenced indictment are unrelated and irrelevant to the plaintiff's General Business Law claims, and only serve to inject inflammatory material prejudicial to our client's interests in this case.

Respectfully submitted,

David L. Darwin

cc: All counsel of record via e-file